

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

In Re: \_\_\_\_\_ ) Case No: 22-11885  
Ladeyiha Reed )  
Debtor(s) \_\_\_\_\_ ) Chapter: Chapter 13  
                  ) Judge: Donald R. Cassling

**NOTICE OF MOTION**

TO: See attached list

PLEASE TAKE NOTICE that on **October 27, 2022 at 9:30 a.m.**, I will appear before the Honorable Donald R. Cassling, or any judge sitting in that judge's place, and present the **MOTION TO EXTEND THE AUTOMATIC STAY**, a copy of which is attached

**This motion will be presented and heard electronically using Zoom for Government.** No personal appearance in court is necessary or permitted. To appear and be heard on the motion, you must do the following:

**To appear by video**, use this link: <https://www.zoomgov.com/>. Then enter the meeting ID and passcode.

**To appear by telephone**, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and passcode.

**Meeting ID and passcode.** The meeting ID for this hearing is **161 414 7941** and the passcode is **619**. The meeting ID and passcode can also be found on the judge's page on the court's website.

**If you object to this motion** and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

By: /s/ David Kosk  
David Kosk  
Geraci Law L.L.C.  
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UNITED STATES BANKRUPTCY COURT  
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In Re: ) Case No: 22-11885  
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**CERTIFICATE OF SERVICE**

I, David Kosk, hereby certify that I served a copy of this notice along with the aforementioned document upon the listed parties, by causing the same to be mailed in a properly addressed envelope, postage prepaid, from 55 E. Monroe, Suite 3400, Chicago, Illinois, on October 18, 2022 before 5:30 p.m.

By: /s/ David Kosk  
David Kosk

**LIST OF PARTIES SERVED**

Thomas H. Hooper, 55 E. Monroe St. #3850, Chicago, IL 60603

Office of the U.S. Trustee, 219 S. Dearborn, Suite 873, Chicago, Illinois 60604

Ladeyiha Marshey Reed, PO Box 368707, Chicago, IL 60636

Kathryn A. Klein c/o Riezman Berger PC, 7700 Bonhomme, 7<sup>th</sup> Fl, St. Louis, MO 63105

Timothy R. Yueill c/o Law Offices of Ira T. Nevel, 175 N. Franklin, Chicago, IL 60606

ALL CREDITORS ON THE ATTACHED LIST

Ladeyiha Marshey Reed PO Box 368707 Chicago, IL 60636	FMA Alliance, LTD PO Box 2409 Houston TX 77252	Portfolio Recovery Associates LLC Bankruptcy Dept PO Box 41067 Norfolk VA 23541	
Advocate Medical Group Bankruptcy Department 75 Remittance Dr., Ste. 1019 Chicago IL 60675	FNB Omaha Attn: Bankruptcy Dept. Po Box 3412 Omaha NE 68103	SELF FINANCIAL/LEAD BA Attn: Bankruptcy Dept. 1801 Main St Kansas City MO 64108	
AVANT Attn: Bankruptcy Dept. 222 N Lasalle St Ste 160 Chicago IL 60601	Holy Cross Hospital 1500 South Fairfield Ave Chicago IL 60608	SELF/ATLANTIC CAPITAL Attn: Bankruptcy Dept. 945 E Paces Ferry Rd Ne Atlanta GA 30326	
Capital One Bankruptcy Department PO Box 30285 Salt Lake City UT 84130	Illinois Eye Institute 3241 S Michigan Ave Chicago IL 60616	Sprint Bankruptcy Dept. PO Box 7949 Overland Park KS 66207	
City of Chicago Bureau Parking Bankruptcy Dept/City Clerk 121 N. LaSalle St Room 107 Chicago IL 60602	Illinois State Toll Hwy Auth Attn: Legal Dept - Bob Lane 2700 Ogden Ave. Downers Grove IL 60515-1703	SPS Portfolio Bankruptcy Department PO Box 65250 South Salt Lake UT 84165	
Comcast Cable Bankruptcy Department 1701 John F. Kennedy Blvd Philadelphia PA 19103	LVNV Funding Bankruptcy Department 355 S Main St Ste 300-D Greenville SC 29601	Syncb/CAR CARE SYN CAR Attn: Bankruptcy Dept. Po Box 965036 Orlando FL 32896	
Comenitycapital/Mycash Attn: Bankruptcy Dept. Po Box 182120 Columbus OH 43218	MCYDSNB 3911 S Walton Walker Blvd Dallas TX 75265	Syncb/JCP Attn: Bankruptcy Dept. Po Box 965007 Orlando FL 32896	
Credit One Bank Bankruptcy Dept 6801 S Cimarron Rd Las Vegas NV 89113	Medicredit PO Box 1629 Hazelwood MO 63043	Syncb/PPC Attn: Bankruptcy Dept. Po Box 530975 Orlando FL 32896	
DEPT OF EDUCATION/NELN Attn: Bankruptcy Dept. 121 S 13Th St Lincoln NE 68508	Mercy Medical Group PO Box 1279 Oaks PA 19456	Monterey Financial Svc. 4095 Avenida De La Plata Oceanside CA 92056	TBOM/ATLS/Aspire Attn: Bankruptcy Dept. 5 Concourse Pkwy Ste 400 Atlanta GA 30328
Farmers Insurance Bankruptcy Dept. PO Box 948 Aurora IL 60507-0948	Nationwide Credit & Collection Bankruptcy Department 815 Commerce Dr., Ste. 270 Oak Brook IL 60523	Onemain Attn: Bankruptcy Dept. Po Box 1010 Evansville IN 47706	TD AUTO Finance Attn: Bankruptcy Dept. Po Box 9223 Farmington MI 48333
FEB DESTINY/GF Attn: Bankruptcy Dept. 15220 Nw Greenbrierpky Beaverton OR 97006	Oportun/PROGRESO FINAN Attn: Bankruptcy Dept. 3201 Dallas Pkwy Ste 700 Frisco TX 75034	Jefferson Capital Systems LLC Bankruptcy Dept. PO Box 7999 Saint Cloud MN 56302	
First Premier BANK Attn: Bankruptcy Dept. 601 S Minnesota Ave Sioux Falls SD 57104	Peoples Gas Bankruptcy Department 200 E. Randolph Dr. Chicago IL 60601	TD BANK USA/Targetcred Attn: Bankruptcy Dept. Po Box 673 Minneapolis MN 55440	

Upgrade INC  
Attn: Bankruptcy Dept.  
275 Battery St Fl 23  
San Francisco CA 94111

Visitation Catholic School  
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IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

In Re: ) Case No: 22-11885  
Ladeyiha Reed )  
Debtor, ) Chapter: Chapter 13  
 )  
 ) Judge: Donald R. Cassling

**MOTION TO EXTEND THE AUTOMATIC STAY**

NOW COMES the Debtor, Ms. Ladeyiha Reed (the “Debtor”), by and through her attorneys, Geraci Law LLC, to present her **Motion to Extend the Automatic Stay** pursuant to 11 U.S.C. §§. 105 and 362(c)(3), and states as follows:

1. This Court has jurisdiction pursuant to 11 U.S.C. 1334 and this is a “core proceeding” under 28 U.S.C. 157(b).
2. The Debtor filed a petition for bankruptcy protection under Chapter 13 of the US Bankruptcy Code and a plan of reorganization on 10/14/2022.
3. The Debtor filed a previous petition for bankruptcy protection under Chapter 13 of the US Bankruptcy Code on 01/10/2019, case number 19-00768. The case was dismissed on 09/15/2022 for failure to make plan payments.
4. The Debtor’s circumstances have changed as follows (see affidavit attached as Exhibit A):
  - a. In the previous case, the Debtor fell behind on her Chapter 13 plan payments when she temporarily stopped receiving social security income for her adult disabled daughter.
  - b. The Debtor has since resolved the issue with the social security income and is now again receiving said income enabling her to afford the plan payments on this case.

Additionally, this Chapter 13 case proposes a 100% dividend to general unsecured

claims.

5. The Debtor is filing this case in good faith.
6. The schedules I and J of the previous case have been attached as Exhibit B, the schedules I and J of the current case have been attached as Exhibit C.

WHEREFORE, the Debtor, Ms. Ladeyiha Reed, prays this Court enter an order:

1. Extending the Automatic Stay as to all creditors until such time as the stay is lifted by a party in interest as to that party only following notice and a hearing or such time as this case is dismissed or discharged; and
2. Any other relief that this Court deems just and proper.

Respectfully submitted,

/s/ David Kosk  
David Kosk

**Attorneys for the Debtor**

Geraci Law L.L.C.  
55 E. Monroe Street #3400  
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